

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015. It outlines actions taken by Stena Drilling Ltd to prevent Modern Slavery and Human Trafficking in its business and supply chains for the financial year ending 31<sup>st</sup> December 2023.

## Our Position

Stena Drilling Ltd conducts its operations ethically in terms of all business dealings and relationships. The Company prides itself on its reputation for acting fairly and honestly wherever it does business. The Company's reputation is built on its core values (Care, Innovation & Performance), the values of its employees and its collective commitment to acting with integrity throughout the organisation. Stena Drilling Ltd is part of the larger Stena AB group.

Stena Drilling Ltd has a zero-tolerance approach to Modern Slavery. The Company continues to recognise its responsibility to address and mitigate the risk of Modern Slavery and Human Trafficking within its global operations. This statement sets out our commitment and actions taken to attain the above assertions.

## Our Operations and Supply Chains

Stena Drilling Ltd is a prominent, independent drilling contractor, staffed to operate a fleet of mobile drilling vessels providing customers with drilling services. Our operations focus on combining maximum performance with a high level of safety.

Throughout its operations the Company obtains a variety of goods and services from global suppliers. The aim is to establish and maintain a competitive, reliable and sustainable supply chain wherever it operates. In dealing with all of these suppliers the Company endeavours to always act in an ethical and socially responsible manner.

## Relevant Policies and Actions

- Stena Drilling Ltd has a high level 'Modern Slavery and Human Trafficking Policy' which confirms its zero-tolerance approach to Modern Slavery. The policy verifies that the Company would terminate its relationship with other individuals and organisations working on its behalf if they are found to be in breach of the policy.
- For all offshore employees Stena Drilling Ltd adhere to the Maritime Labour Convention (MLC) 2006 standards for conditions of employment. Including but not limited to: wages, hours of rest, repatriation, employment contracts, medical certification, accommodation and training. Seafarer's employment agreements (contracts of employment) are in accordance with The Merchant Shipping (Hours of Work) Regulations 2018 standards and regularly reviewed and updated internally. These are audited and approved by the Maritime and Coastguard Agency annually.
- The Company's vessels (and onshore office) have been audited by the Maritime and Coastguard Agency against the Maritime Labour Convention 2006 within the last year. This has proven our adherence to MLC standards.

- Third party audits have been conducted to ensure and confirm labour standards. Third party labour providers Maritime Labour Convention accreditation document has been obtained and tracked.
- Stena Drilling Ltd's recruitment procedure includes an employee screening process to confirm eligibility to work in order to protect against modern slavery and human trafficking.
- Stena Drilling Ltd's Recruitment Team have a Preferred Suppliers List (PSL) of recruitment agencies they use for the recruitment of personnel internationally. Each agent must agree to a Modern Slavery clause within their service agreement before engaging in business with the Company. Such service agreements are continually reviewed and updated in line with current legislation.
- The Company's supplier qualification processes include the use of Achilles First Point Assessment (SEQual) which qualifies, evaluates and monitors suppliers on behalf of the UK Oil and Gas Industry.
- All employees have completed annual e-learning training in relation to the Company's Code of Conduct and Anti-Bribery and Corruption Policy. Both policies outline the expectation that its employees will conduct business with the highest level of integrity and respect for the interests of those with whom it has relationships.
- Stena Drilling Ltd added a high-level 'Whistleblower Policy' and corresponding 'Whistleblower Guidance' document to the Stena Management System (SMS) in 2023. These highlight that employees have the right to raise any concerns regarding improper activity they may suspect or have witnessed and advise the appropriate channels for reporting such concerns.

### Responsibility

The Board has overall responsibility for ensuring legal and ethical obligations relating to Modern Slavery and Human Trafficking are met, and that all those under the Company's control comply. Stena Drilling Ltd as a whole is committed to monitoring its policies and actions as outlined in this Statement.

Rev	Prepared By	Reviewed By	Approved By:	Date:	Reason for Revision:
5	K Burr HR Advisor	A Boston Assistant HR Manager T Craig Chief HR Officer	E Ronsberg Chief Executive Officer	18.06.24	Periodic review. Title of statement revised from 2022 to 2023. Section for Relevant Policies and Actions updated. Replace FPAL with SEQual. (QA Ref: 1387/24)
4	A Boston Assistant HR Manager	T Craig Chief HR Officer	E Ronsberg Chief Executive Officer	25.04.23	Periodic review. Title of statement revised from 2020 to 2022. Stena Drilling Ltd updated throughout. (QA Ref: 0647/23)
3	A Boston Assistant HR Manager	T Craig HR Manager	E Ronsberg Managing Director	12.03.21	Periodic review. Title of statement revised from 2018 to 2020. 'Actions' slightly amended and added new action of the whistle-blower

## Modern Slavery and Human Trafficking Statement 2023

Page : 3 of 3  
Rev No : 5  
Date : 18.06.2024  
Doc No : L1-POL-MD-6804

					nano training which has been undertaken. (QA Ref: 0010/21)
2	A Slessor HR Generalist	T Craig HR Manager	E Ronsberg Managing Director	06.02.19	Update to title - to read 2018. • Update to SDL's financial year end date. • Updated action for 2018, the SEA audit in June and re-issue of documentation. (QA Ref: 0265/19)
1	A Slessor HR Generalist	T Craig HR Manager	E Ronsberg Managing Director	21.08.2017	For implementation (QA Ref:3089/17)